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Counsel for Federal Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

STATE OF ALASKA,)	
)	
Plaintiff,)	Case No. 3:23-cv-00203-SLG
)	
v.)	
)	
THE UNITED STATES)	
DEPARTMENT OF AGRICULTURE,)	
et al.,)	
)	
Defendants.)	

SOA v. U.S. DOA, et al.

Unopposed Motion for Extension of Time

Case No. 3:23-cv-00203-SLG

INSIDE PASSAGE ELECTRIC)	
COOPERATIVE, et al.,)	
)	Case No. 3:23-cv-00204-SLG
Plaintiffs,)	
)	
v.)	
)	
THE UNITED STATES)	
DEPARTMENT OF AGRICULTURE,)	
et al.,)	
Defendants.)	
GOVERNOR FRANK MURKOWSKI,)	
et al.)	
)	Case No. 1:23-cv-00010-SLG
Plaintiffs,)	
)	
v.)	
)	
TOM VILSACK, et al.,)	
)	
Defendants.)	

DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME

In accordance with Federal Rules of Civil Procedure (“FRCP”) 12 and Local Civil Rules (“L.R.”) 7.1(b)(3)(B) and 7.3(b), Federal Defendants seek an extension of time to file the answers and lodge the administrative record in the above-referenced actions. The parties have conferred and will soon jointly move to consolidate the above cases pursuant to FRCP Rule 42 and designate *State of Alaska v. USDA et al.*, Case No. 3:23-cv-00203-SLG as the lead case designation into which all three matters would be consolidated. The parties are also negotiating a joint scheduling motion.

While the parties finalize these submissions to the Court, Defendants request that the Court extend the time for Defendants to file their answers under FRCP 12(a)(2) and (3) to December 13, 2023 to allow for more time to draft and obtain client agency input. Defendants also request that the time for the lodging of the administrative record under L.R. 16.3(b) be extended to January 19, 2024. Defendants request the additional time to consult with the client agency about the administrative record and to assemble the record.

Defendants thus respectfully submit that good cause exists for granting this unopposed extension of time. Plaintiffs do not oppose this motion—and have agreed to both extended deadlines in the joint scheduling motion that will be submitted to the Court.

DATED this 7th day of November, 2023.

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CERTIFICATE OF SERVICE

I certify that on November 7, 2023, I filed the foregoing using the Court's ECF system,
which will provide service to all counsel of record.

/s/ Paul G. Freeborne
PAUL G. FREEBORNE
Trial Attorney